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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**JANE DOE,**

Plaintiff

v.

**LOMBARDO ET AL.,**

Defendant

**AFFIDAVIT OF RUSSELL GREER**

Case No.: 3:24-cv-00065

I, Russell Greer, in accordance with, declare as follows:

1. I am the proposed-intervenor in the above-referenced case, pending in the Federal District of Nevada.
2. I have first-hand knowledge regarding the actions of counsel for Plaintiff Jane Doe.
3. This affidavit supports my motion to intervene.

**2018**

4. In 2018, I was 27 years old and was living in Salt Lake City, Utah (SLC).
5. I had been a customer at Nevada's brothels and mostly patronized the Lyon-area brothels because Amtrak goes to Reno from SLC.
6. I was friends with the Bunny Ranch brothel owners, Dennis Hof and Suzette Cole.
7. I would occasionally text Dennis and Suzette and they seemed like law-abiding people, although Dennis had a short-temper, which I often found myself the end of. For example, he once called me a "cluster f\*\*\*\*\*" for talking to gossip news outlet TMZ about an incident that happened at his brothel.
8. All in all, I could tell Mr. Hof cared about his business.
9. I had been going to the "Hof brothels" since 2013.

**The Independent Contractors of Mr. Hof**

10. All through my time of going to the Hof brothels, from 2013 to 2018, the sex workers who were working at the Hof brothels (aka independent contractors) never once claimed to be trafficked.
11. The sex workers worked at the Bunny Ranch, Sagebrush Ranch, Love Ranch North and Kit Kat Ranch.
12. I had communicated with the sex workers via email, in-person and, at times, text, if the women felt comfortable giving me their numbers.

13. At no point did any sex workers text me asking for me to “free them” or any other words or signals of distress.
14. In fact, I had a few sex workers refuse to see me, which they did by quoting me a price above my ability to spend. This is often called “upselling”.
15. I am disabled and I felt them upselling was a form of discrimination. I had to also take a few breaths to calm down to remind myself that they are independent contractors, free to see whom they wish. This fact alone proves the women aren’t being trafficked.
16. All of the women appeared to be older than 18.
17. I never observed any of the women being intoxicated or drugged, e.g. no slurred speech, no stumbling, etc.
18. I had a sex worker once randomly cut ties with me because she said, “it’s my job to f\*\*\* ‘ugly people,’” in reference to me.
19. Again, a trafficked person would not use the word “job” to describe their occupation at the brothels.
20. For the sake of argument, supposing it was a pimp texting me and not the actual woman, at no time when I was in bed with any of the workers, did any of them whisper or ask for help.
21. In fact, the women giggled, smiled, mutually touched me, kissed me, groped me, etc, when I was with them.
22. I never once observed any of the workers wince or close their eyes in disgust with me.

#### **DEBT BONDAGE**

23. As for the current bogus claims in this complaint of “debt bondage”, every single worker at the Hof brothels never told me they were in debt bondage. In fact, the women told me their brothel gigs were more lucrative than jobs they had done previously.

24. The women boosted my self-esteem by giving me terms of endearment and showed me intimacy I could never find elsewhere.
25. I have in fact paid sex workers illegally in Utah and in Vegas and all of the women I met in the illegal instances were much more “on edge” than any legal Nevada sex worker I met.

### **Jason Guinasso’s Entrance into my Life**

26. Around the Spring of 2018, it was announced that an organization called, “No Little Girl” was doing ballot initiatives in Lyon County to abolish prostitution. I soon learned the NLG lawyer was Jason Guinasso, a Reno-based lawyer.
27. The more I learned about Guinasso, the less I liked him.
28. Guinasso was soon discovered to be a Christian pastor.

### **Religious Harms vs. Brothel Harms**

29. It soon made sense why Guinasso was leading his moral crusade: because his religion disagrees with prostitution.
30. As a former member of the LDS religion, I can honestly tell this Court that there is more abuse and manipulation in religion than there is in Nevada brothels.
31. I was a former LDS missionary and there is a stronger argument to be made against the LDS church for trafficking 19 year old missionaries than there is against Nevada brothels.
32. It’s not just the LDS religion. All religion guilty people into fearing an invisible entity that for some very strange reason can’t show himself or stop wars or stop children from dying of cancer, yet Mr. Guinasso wants everyone to believe in such fraudulent nonsense by imposing his views through his lawsuits.

### **The 2019 Lawsuit**

33. In 2019, after losing the 2018 initiatives, I saw Guinasso file a lawsuit against the Nevada Legislature, amongst other government defendants.

34. As a legal assistant myself, I could see not a serious lawsuit, but more of a lawyer frustrated with losing a ballot initiative and so he was trying his hand at a lawsuit, which I felt was unethical.

35. I have never met Guinasso, but he just seems very unkind, based on how he treats me through motions.

36. For instance, Guinasso called me a “trafficker” in one of his responses in 2019 to my motion to intervene.

37. Guinasso’s logic behind calling me a trafficker was that I had transported myself across state lines to a brothel.

38. His argument was ridiculous because a simple Google Scholar search shows that’s not what constitutes trafficking.

39. I’ve noticed that Guinasso can freely insult his opponents, but any criticism levied at him is deemed “unkind”.

40. His comments made about me are why I continue to intervene because I know his litigation isn’t because it’s with merit, but rather, he’s abusing the system to shut down brothels, any way possible. It’s a pattern of frivolous behavior.

### **2019: Meeting Bella Cummins**

41. In 2019, I went to Bella’s Hacienda, a defendant in this case.

42. There was no barbed wire fence surrounding the property.

43. The front door has a lock that one has to press a door bell to be let in.

44. I never viewed the door as a means to entrap women, rather, I viewed it as a means of protection since they are a business selling sex and the door acts as a means of protection against persons with ill-intent who might want to sneak into the brothel and assault women.

45. Again, like with the Lyon sex workers, the Wells sex workers were clearly there to make money.

46. I detected no signs of duress or trafficking.

47. My sexual interactions at Bella's were consensual, met with mutual touching and giggles and laughs.

48. I met the owner, Bella Cummins, and she did not seem controlling and truly cared about her business.

### **2022: Sheri's Ranch**

49. In 2022, I went to a Pahrump-area brothel called, Sheri's Ranch.

50. Although not a defendant in this action, my experience at Sheri's shows a consistent pattern: the brothels are ran ethically.

51. The brothel was very nice in Architecture and Design.

52. Sheri's has no gate or barbed wire fence.

53. I met a woman named Max.

54. Max said she felt safe at the brothel

55. Max and I are still in contact to this day and Max has never said Sheri's trafficked her.

Rather, her only complaint was that Sheri's wouldn't allow news crews in the brothel and thus they were missing out on million dollar money-earning opportunities.

56. I also met a woman named Anika.

57. Anika was at the brothel to make money to open a yoga business.

58. Anika, too, felt safe in the brothel.

59. My interaction at Sheri's and other brothels disproves Plaintiff's argument that all brothels traffick women, when every single brothel I have patronized, from 2013 to 2024, are ran by seemingly ethical standards and the women have never once signaled for help if they were indeed being trafficked.

60. I also run a Political Action Committee that seeks to improve the Nevada brothels.

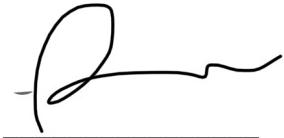
61. I intervened to preserve the status quo of legal prostitution.

62. I seek to intervene to bring a stop to Guinasso's frivolous activities.

63. I consider myself an honest and law-abiding person.

64. I am writing this affidavit because the blatantly frivolous actions of Mr. Guinasso and his  
partnered D.C.-area lawyers needs to stop.

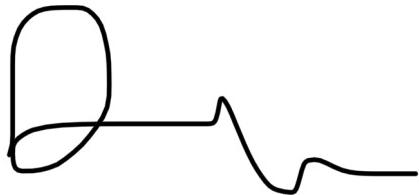
Signed this day, under penalty of perjury: December 7<sup>th</sup>, 2024



Russell Greer

Per NRS 15.010:

Under penalties of perjury, I, **Russell Greer**, the undersigned, declares that I am the proposed-intervenor named in the foregoing affidavit and I know the contents thereof; that the pleading is true of my own knowledge, except as to those matters stated on information and belief, and that as to such matters I believe it to be true.

A handwritten signature in black ink, appearing to read "Russell Greer". The signature is fluid and cursive, with a large, open loop on the left side and a more compact, horizontal section on the right.

**CERTIFICATE OF SERVICE:**

Pursuant to FRCP 5(b), I certify that on December 7<sup>th</sup>, 2024, I served a true and correct copy of the attached document by Electronic Mail to all attorneys.